

MEMO ENDORSED

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January 4, 2021

Via ECF:

Hon. Nelson S. Roman

Re: Ruiz, Sandra, v Chubb National
Docket No.: 7:19-CV-9518 (AEK) (NSR)

Dear Judge Roman:

I am the attorney on behalf of the defendant in this case and I am writing with the consent of the plaintiff. There is a Case Management Conference scheduled before your Honor on January 7, 2021. We are mutually requesting an adjournment of this conference because discovery, while nearing the end, has been delayed, mainly because of issues arising out of COVID, the inability to get records, the delays in scheduling things, etc. On 11/20/20 and 12/18/20, we explained these issues to the new Magistrate on the case, Andrew E. Krause. As such he granted our letter motion extending discovery deadlines, such that the last item on the agenda, the exchange of supplemental expert reports, has been extended until March 15, 2021 and we have a further conference with him on 1/28/21.

Thus, it is respectfully requested that this court reschedule the 1/7/21 conference until sometime in early April, such as April 22, 23, or 30, or whatever pleases the court. This is our second request for an adjournment of this conference. We look forward to your advice and thank you for your attention herein.

Respectfully yours,

MICHAEL G. MEHARY (Ext. 218)
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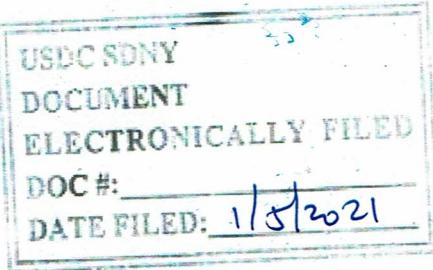
CC Via ECF: Law Firm of Miguel A. Ruiz

Due to an extension of the discovery deadlines, Deft's request, with Pltf's consent, to adjourn the Status Conf.

from Jan. 7, 2021 until Apr. 23, 2021 at 10:00 am is granted and will be held telephonically. To access the AT&T teleconference, please follow these directions: (1) Dial the Meeting Number: (877) 336-1839; (2) Enter the Access Code: 1231334 #; (3) Press pound (#) to enter the teleconference as a guest. Clerk of Court requested to terminate the motion (doc. 31).

SO ORDERED:

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE



Dated: Jan. 5, 2021